

1 Mark A. Hutchison (4639)
2 Sandra S. Robertson (5504)
3 Stuart J. Taylor (14285)
HUTCHISON & STEFFEN, PLLC
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
Tel: (702) 385-2500
Fax: (702) 385-2086
mhutchison@hutchlegal.com
srobertson@hutchlegal.com
staylor@hutchlegal.com

8 *Attorneys for Defendants Desert Health Care
Facilities Inc. d/b/a Highland Manor
Associates, Highland Manor and Drew Banford*

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE DISTRICT OF NEVADA**

12 NEW HORIZON HOME CARE, LLC and
13 GUIDING LIGHT HOSPICE, INC.

14 Plaintiffs,

15 v.

16 PHC-ELKO, INC. dba NORTHEASTERN
17 NEVADA REGIONAL HOSPITAL;
HORIZON HOSPICE, INC.; GENESIS
18 HOSPICE, LLC; GENESIS HOME HEALTH
SERVICES, INC.; DESERT HEALTH CARE
FACILITIES INC. dba HIGHLAND MANOR
ASSOCIATES; HIGHLAND MANOR; ELKO
19 HIGHLAND VILLAGE OF ELKO; DREW
BANFORD; BILLIE JEAN CRAWFORD,
TRAVIS SPENCER, QUERUBIN IGUBAN,
JR., M.D.; DEBRA ANDERSON;
20 MARISSELLA (CHELLA) ELLIOT, ALICE
ALLEN, et al

21 Defendants.

22 Case No. 3:19-CV-00521-RCJ-WGC

23 **STIPULATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
SECOND AMENDED COMPLAINT
(FIRST REQUEST)**

24 Pursuant to Local Rules IA 6-1, Plaintiffs NEW HORIZON HOME CARE, LLC and
25 GUIDING LIGHT HOSPICE, INC. ("Plaintiffs") and Defendant DESERT HEALTH CARE
26 FACILITIES INC. d/b/a HIGHLAND MANOR ASSOCIATES, HIGHLAND MANOR and DREW
27 BANFORD ("Defendant") (collectively, the "Parties") hereby stipulate and agree as follows:
28

1 1. On June 19, 2020, Plaintiff filed its Second Amended Complaint. (ECF No. 124);;
2 2. Defendant's deadline to respond to the Second Amended Complaint is July 6, 2020;
3 4. The Parties stipulate and agree that the Defendant's shall have until July 28, 2020 to
4 file their responsive pleading to Plaintiffs' Second Amended Complaint; and
5

5 5. This is the first request for an extension of time to respond to Plaintiffs' Second
6 Amended Complaint.

8 In view of the foregoing, good cause supports this stipulated Motion. The Parties
9 respectfully request that the Court grant this Motion and extend Defendant's deadline to file an
10 Answer or responsive pleading to the Second Amended Complaint to July 28, 2020.

11 **IT IS SO STIPULATED.**

12 DATED this 30th day of June, 2020

13 JOSEPH C. ALAMILLA, PLLC

14
15 */s/ Joseph C. Alamilla*
Joseph Carlos Alamilla
P.O. Box 543
Centerville, UT 84014
801-232-2666/Fax: 866-254-9597
joseph@jcalegalsolutions.com

16
17 Stephen S. Kent
KENT LAW, PLLC
201 W. Liberty, Suite 320
Reno, NV 89501
775-234-9800/Fax: 702-324-9803
skent@skentlaw.com

18
19 *Attorney for Plaintiffs*

20 DATED this 30th day of June, 2020

21 HUTCHISON & STEFFEN, PLLC

22
23 */s/ Sandra S. Robertson*
Mark A. Hutchison (4639)
Sandra S. Robertson (5504)
Stuart J. Taylor (14285)
10080 West Alta Drive, Suite 200
Las Vegas, NV 89145
702-385-2500/Fax: 702-385-2086
mhutchiso@hutchlegal.com
srobertson@hutchlegal.com
staylor@hutchlegal.com

24
25 *Attorneys for Defendants Desert Health Care
Facilities Inc. d/b/a Highland Manor
Associates, Highland Manor and Drew Banford*

26 **ORDER**

27 IT IS SO ORDERED.

28 DATED this 6th day of July, 2020

29
30 

U.S. Magistrate Judge